

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:19-cr-00458-MO

v.

SECOND SUPERSEDING  
INDICTMENT

JOHN L JACKSON, aka Nelly, and  
DIANA PETROVIC,

Defendants.

18 U.S.C. §§ 1591(a)(1), (2), and (b)(1)  
18 U.S.C. §§ 1591(a)(1), (2), and (b)(2)  
18 U.S.C. § 1594(c)  
18 U.S.C. §§ 2423(a) and (e)

Forfeiture Allegations

THE GRAND JURY CHARGES:

COUNT 1  
(Conspiracy to Engage in Sex Trafficking)  
(18 U.S.C. § 1594(c))

Beginning as early as on or about August 1, 2018, and continuing through September 30, 2018, in the District of Oregon and elsewhere, defendants **JOHN L JACKSON** and **DIANA PETROVIC**, knowingly and intentionally combined, conspired, confederated, and agreed with each other and with others known and unknown to the Grand Jury to, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, and did benefit financially and by receiving anything of value from participating in a venture engaged in such acts, knowing and in reckless disregard of the fact that force, threats

of force, fraud, or coercion would be used to cause the person to engage in a commercial sex act; and that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a);

In violation of Title 18, United States Code, Section 1594(c).

**COUNT 2**  
**(Sex Trafficking of a Child)**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**

Beginning as early as on or about August 1, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely Minor Victim 4, who had attained the age of 14 years but had not yet attained the age of 18 years, and did benefit financially and by receiving anything of value from participating in a venture which engaged in such conduct, and did such acts knowing and in reckless disregard of the fact that Minor Victim 4 had not attained 18 years of age and that Minor Victim 4 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(2)).

**COUNT 3**  
**(Sex Trafficking of a Child)**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**

Beginning as early as on or about August 1, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely Minor Victim 5, who had attained the age of 14 years but had not yet attained the age of

18 years, and did benefit financially and by receiving anything of value from participating in a venture which engaged in such conduct, and did such acts knowing and in reckless disregard of the fact that Minor Victim 5 had not attained 18 years of age and that Minor Victim 5 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections §§ 1591(a)(1), (a)(2), and (b)(2))

**COUNT 4**  
**(Sex Trafficking by Force, Fraud and Coercion)**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(1))**

Beginning as early as on or about August 1, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely Minor Victim 5, and did benefit financially and by receiving anything of value from participating in a venture which engaged in such conduct, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 5 to engage in a commercial sex act, and such means were used;

In violation of Title 18, United States Code, Sections §§ 1591(a)(1), (a)(2), and (b)(1).

**COUNT 5**  
**(Transportation of a Minor with Intent to Engage in Sexual Activity)**  
**(18 U.S.C. §§ 2423(a) and (e))**

Beginning as early as on or about September 3, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, namely Minor Victim 4, in interstate commerce from the

State of Oregon to the State of Washington, while having the intent that Minor Victim 4 engage in prostitution, or in any sexual activity for which a person can be charged with a criminal offense, and attempted and conspired to do so;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

**COUNT 6**  
**(Transportation of a Minor with Intent to Engage in Sexual Activity)**  
**(18 U.S.C. §§ 2423(a) and (e))**

Beginning as early as on or about September 3, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, namely Minor Victim 5, in interstate commerce from the State of Oregon to the State of Washington, while having the intent that Minor Victim 5 engage in prostitution, or in any sexual activity for which a person can be charged with a criminal offense, and attempted and conspired to do so;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

**COUNT 7**  
**(Sex Trafficking of a Child)**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**

Beginning as early as on or about September 6, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely Minor Victim 5, who had attained the age of 14 years but had not yet attained the age of 18 years, and did benefit financially and by receiving anything of value from participating in a venture which engaged in such conduct, and did such acts knowing and in reckless disregard of

the fact that Minor Victim 5 had not attained 18 years of age and that Minor Victim 5 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(2).

**COUNT 8**  
**(Sex Trafficking by Force, Fraud and Coercion)**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(1))**

Beginning as early as on or about September 6, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely Minor Victim 5, and did benefit financially and by receiving anything of value from participating in a venture which engaged in such conduct, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 5 to engage in a commercial sex act, and such means were used;

In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(1).

**COUNT 9**  
**(Transportation of a Minor with Intent to Engage in Sexual Activity)**  
**(18 U.S.C. §§ 2423(a) and (e))**

Beginning as early as on or about September 6, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, namely Minor Victim 5, in interstate commerce from the State of Washington to the State of Oregon, while having the intent that Minor Victim 5 engage

in prostitution, or in any sexual activity for which a person can be charged with a criminal offense, and attempted and conspired to do so;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

**FIRST FORFEITURE ALLEGATION**

Upon conviction of the offenses set forth in Counts 1, 2, 3, 4, 7, and 8, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1594(d), defendants' interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds defendants obtained, directly or indirectly, as a result of such violations.

**SECOND FORFEITURE ALLEGATION**

Upon conviction of the offenses set forth in Counts 5, 6 and 9, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, defendants' interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds defendants obtained, directly or indirectly, as a result of such violations.

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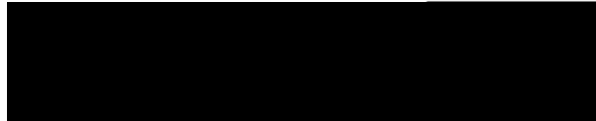
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**THIRD FORFEITURE ALLEGATION**

Upon conviction of the offense in Count 4 or Count 8, **JOHNL JACKSON**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the commission of the offense(s).

Dated: November 17, 2021.

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG  
Acting United States Attorney

A handwritten signature in blue ink, appearing to be "P. Paaso", written over a horizontal line.

PAMELA PAASO, TXSB #24060371  
ASHLEY R. CADOTTE, OSB #122926  
Assistant United States Attorneys